

Public

Ref: FOI/25/291

National Energy System Operator
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18 March 2026

Dear requester

Request for Information

Thank you for your request for information which was received by NESO on 18 February 2026. Your request has been considered under the Environmental Information Regulations 2004 (EIR). This is because the information requested relates to a measure that could affect the environment and therefore meets the definition of 'environmental information' provided at Regulation 2(1)(c) of the EIR.

Request

You asked us ... *could you please provide the most up-to-date dataset you hold for transmission-connected demand sites? Specifically, I'm looking for the following fields (for all historic and currently connected sites, where available):*

- *Site Name*
- *Region*
- *Node ID*
- *Capacity (MW)*
- *Year of Connection.*

Our response

NESO does not currently maintain a single dataset or register of demand connections. There is no requirement under the Connection and Use of System Code (CUSC) for us to maintain or publish one, unlike our obligation to do so for generation connections (the TEC Register). We have previously had enquiries about providing a demand register and are considering this as a development piece.

We do hold data on transmission connected demand however this data is currently held in various data sources. Compiling a complete dataset of transmission-connected demand sites would require manual searches across records, with the information in scope of your request needing to be extracted from these sources, reviewed, validated and consolidated.

Unlike the Freedom of Information Act, where Section 12 allows for refusal of a request where compliance would exceed 18 hours of staff time, the EIR have no appropriate cost limit. However, there is provision at Regulation 12(4)(b) for public authorities to refuse a request which would place an undue burden on the organisation. Whilst we are in no way suggesting that it was your intention to submit an unreasonable request, we estimate that responding to your request would represent a significant amount of employee resource with the effect that it would be manifestly unreasonable for us to respond.

When engaging Regulation 12(4)(b) of the EIR, burden can be thought of in terms of cost and can also take account of the distraction of resources, i.e., the disruption to the delivery of other services caused by staff having to spend time dealing with the request. We acknowledge that we are normally expected to exceed the FOIA appropriate cost limit for EIRs, but complying with this request would require significant resource from specialist teams who are currently delivering a transformational change to the Connections process, making it fit for the future and supporting the delivery of Clean Power by 2030.

The ICO encourages public authorities to consider extending the EIR deadline as a preference to refusing a request and we do look at this option where it is feasible. We have determined in this case that it is not the 20-working day deadline that is the issue, but the burden that managing the request would place on NESO. This is particularly the case for connections related requests given that the employees involved in the extracting and collating the data in question would be diverted from key tasks relating to the connections reform process.

The exception provided at Regulation 12(4)(b) of the EIR is subject to the public interest test.

There is a general public interest in public organisations being accountable and transparent and NESO ensures that it upholds as far as possible the presumption of disclosure under EIR. The disclosure of information in many circumstances may increase public understanding of decision making, facilitate effective public participation and, in this case, increase the public's knowledge of the demand connections pipeline.

Public authorities must however be protected from any disproportionate burden caused by

requests for information. It is not in the public interest for NESO's resources to be diverted away from its key functions. As referenced above, NESO is delivering a transformational change to the way that the grid connections process operates. Given the importance of Connections Reform to Great Britain, there is no public interest in diverting staff away from this key project, particularly as the development and creation of a demand register is a project currently under consideration that will be progressed when appropriate resource and expertise can be dedicated to it.

On balance we therefore believe that the public interest lies in maintaining the exception.

This concludes our response to your request.

Advice and assistance

Regulation 9 of the EIR requires a public authority to provide advice and assistance to requesters. When engaging Regulation 12(4)(b) because of the burden or cost that responding to the request would represent, there is an expectation that a public authority should provide the requester with reasonable advice and assistance to help them submit a less burdensome request.

We are finding it difficult to provide advice on narrowing down the scope of your request in such a way that we would be able to provide a response without it being overly burdensome and diverting employee resource from key activities. Advising you to substantially reduce the number of projects or limiting the projects to specific geographical areas or zones may mean that information we may be able to disclose may not fulfil your purposes.

As you may be aware, requests under the FOIA and EIR are 'applicant and purpose blind'. However, if you did wish to submit a refined request it may be helpful if you provided some information on why you are interested in this information, as it may assist us to explain what information we are able to provide without a disproportionate burden on the organisation.

We manage all requests on a case-by-case basis, and uphold the presumption of disclosure provided by the EIR but it may be helpful for you to understand that NESO is limited on the information we can disclose on specific developers or their projects as we are bound by confidentiality obligations and are subject to the Utilities Act 2000, Section 105 of which makes it a criminal offence for us to disclose information obtained under the Act (subject to some exceptions).

We have provided below further information that may be of interest to you:

- Based on NESO's current Connections Reform and queue outcome datasets (see below for further information on Connections Reform), we can advise there is an approximate aggregated total of 20 GW of "Transmission Connected Demand" in the connection queue. This total may fluctuate substantially when 'Demand' categorisation work, part of NESO's Strategic Demand Initiative (in development, in collaboration with Ofgem, the Department of Energy Security and Net Zero and networks) is completed.
- In collaboration with government and Ofgem, NESO is working at pace to identify and implement solutions that ensure fair and efficient access to the transmission network for demand projects. A critical part of this effort is ensuring that decisions are based on accurate, up-to-date data about the existing queue. Activities supporting this include NESO's Demand Call for Input, which was issued in November 2025, and more recently, NESO's Demand Information Request Notice (IRN). More information on the IRN as well as high level insights from NESO's Call for Input can be found here: [Demand Information Request Notice \(IRN\) | National Energy System Operator](#).
- Further information from Ofgem on the demand connections programme is available: [Demand connections update | Ofgem](#)

Next steps

If you are dissatisfied with our handling of your FOI/EIR request, you can ask us to review our response. If you want us to carry out a review, please let us know within 40 working days and quote the reference number at the top of this letter. You can find our procedure here: [Freedom of Information and Environmental Information Regulations | National Energy System Operator](#). The ICO's website also provides guidance on the internal review process: [What to do if you are dissatisfied with the response | ICO](#).

If you are still dissatisfied after our internal review, you can complain to the Information Commissioner's Office (ICO). You should make complaints to the ICO within six weeks of receiving the outcome of an internal review. The easiest way to lodge a complaint is through their website: www.ico.org.uk/foicomplaints. Alternatively, they can be contacted at: Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

Thank you for your interest in the work of the National Energy System Operator (NESO).

Regards,

The Information Rights Team, National Energy System Operator (NESO)